

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHARLES GOLBERT, Cook County Public )  
Guardian, on behalf of Trinity B., Romeo S., )  
Connor H., Jadiene T., Jymesha S., Tatyana H., )  
and Jamya B., )

Plaintiffs, )

vs. )

Case No. 19-cv-08257

AURORA CHICAGO LAKESHORE )  
HOSPITAL, LLC; SIGNATURE HEALTHCARE )  
SERVICES, LLC; BEVERLY J. WALKER; THE )  
ESTATE OF GEORGE SHELDON; DAVID )  
FLETCHER-JANZEN; NEIL SKENE; MICHAEL )  
C. JONES; TIERNEY STUTZ; BEVERLY MIMS; )  
MARCO LEONARDO; DENISE ELLIS; BROOKE )  
SLOAN; NIAMA MALACHI; TAUSHA BLUITT; )  
ELISABETH SCHEI; RICHARD KASYOKI; )  
DION DILL; NIKOLAY KATSAROV; )  
ANDEBOLA (“DEBBIE”) MAJEKODUNMI; )  
SHANE MICHAELS; and EVE BROWNSTONE, )

Defendants. )

Honorable Judge Mary M. Rowland

**DEFENDANTS SIGNATURE HEALTHCARE SERVICES, LLC AND AURORA  
CHICAGO LAKESHORE HOSPITAL, LLC’S  
MOTION FOR LEAVE TO FILE ADDITIONAL PAGES**

Defendants Signature Healthcare Services, LLC (“Signature”) and Aurora Chicago Lakeshore Hospital, LLC (“Chicago Lakeshore” and, together with Signature, “Moving Defendants”) respectfully move this Court for leave to file a single, thirty-page memorandum in support of their combined Rule 12(b) and Rule 12(e) motion in response to Plaintiffs’ Complaint.

In support of this Motion, Moving Defendants state as follows:

1. Cook County Public Guardian Charles Golbert filed the underlying Complaint on behalf of seven minor Plaintiffs, who allege to be in the custody of the Illinois Department of Children and Family Services and to have received care at Chicago Lakeshore. *See* Dkt. No. 1.

2. Plaintiffs assert sixteen separate counts for relief, under both federal and state law, against more than twenty different Defendants, including Signature, Chicago Lakeshore, and a number of individually-named Defendants. Signature and Chicago Lakeshore's deadline to answer or otherwise plead in response to the Complaint is March 5, 2020. Dkt. No. 25.

3. Given the significant overlap in allegations brought against Signature and Chicago Lakeshore, Moving Defendants intend to file a joint Rule 12(b) and Rule 12(e) motion and memorandum in support of their motion in response to the Complaint. By filing a combined motion, Moving Defendants can efficiently respond to the Complaint and avoid filing redundant motions in response to the nearly identical counts brought against them.

4. Under Local Rule 7.1, a memorandum in support of a Rule 12 motion is limited to fifteen pages absent prior approval of the Court. Moving Defendants seek leave to exceed this page limit and file a thirty-page memorandum in support of their combined Rule 12(b) and Rule 12(e) motion.

5. Good cause exists to grant permission to Moving Defendants to exceed the prescribed page limits for their memorandum in support of their Rule 12(b) and Rule 12(e) motion. A single, thirty-page memorandum, submitted on behalf of both defendants, will allow them to adequately respond to the sixteen counts for relief and almost 200 paragraphs of allegations brought against them.

6. Plaintiffs will not suffer any prejudice if this Motion is granted.

**WHEREFORE**, Defendants Signature and Chicago Lakeshore respectfully move this Court for leave to file a single, thirty-page memorandum in support of their combined Rule 12(b) and Rule 12(e) motion in response to Plaintiffs' Complaint.

Dated: March 2, 2020

Respectfully submitted,

/s/ Craig C. Martin

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Hospital, LLC*

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5 and Northern District of Illinois Local Rule 5.5, the undersigned, an attorney of record in this case, hereby certifies that, on March 2, 2020, a true and correct copy of **Defendants Signature Healthcare Services, LLC and Aurora Chicago Lakeshore Hospital, LLC's Motion for Leave to File Additional Pages** was filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

Dated: March 2, 2020

By: /s/ Matthew R. Devine

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